

Item 38. The proposed explanation in Note 1 to Section 1.1310 defines fully aware individuals as receiving written AND verbal information, including comprehensive training. However, it remains unclear what constitutes verbal information and whether it should be optional in this context. Therefore, we believe further clarification is necessary to ensure proper interpretation.

Items 15/16/Table1: As a general comment to the proposed power and distance criteria, it appears the worst-case theoretical (far-field) equation was applied across all service categories. More realistic prediction models should also be considered as described in OET 65 for aperture and specialized antennas, especially for services utilizing highly directional antennas such as common carrier fixed microwave services. For fixed microwave services, the proposed criteria are extremely impractical and such service should remain categorically excluded (low potential for exceeding the MPE guidelines).